UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

SUBJECT: Review of Bally Indoor Air Data, Facility: Short-Term Risks

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DATE: 7/11/2006

As requested, I have evaluated the short-term risks associated with the Bally facility, using the indoor air quality data obtained in February 2006. The long-term risks were evaluated previously.

For noncancer endpoints, the long-term Hazard Indices (HIs) were all below 1 and would not be expected to increase for a shorter duration of exposure. Cancer risks would decrease about twelve-fold from the chronic estimates (if the worker exposure duration were changed from 25 years to 2 years). Therefore, the cancer risks would not exceed 1E-4, even using the most conservative draft slope factor for trichloroethene (TCE).

The Bally data were also compared to air values (short-term where possible) available from two other agencies. ATSDR has Minimal Risk Levels (MRLs) for all three of the chemicals detected in indoor air: TCE; 1,1-dichloroethene (11DCE); and 1,1,1-trichloroethane (111TCA); though not for chronic exposure. In the table below, the MRLs have been converted to ug/m^3. California EPA has no acute Reference Exposure Levels (RELs) for these chemicals, but does have chronic RELs for two of the chemicals. It can be seen that the Bally concentrations did not exceed MRLs or RELs.

Chemical	Max IAQ result (ug/m^3)	ATSDR MRL (ug/m^3)	CalEPA chronic REL (ug/m^3)
TCE	48	10740 (acute) 537 (intermediate)	600.(chronic)
11DCE	53	79.4 (intermediate)	70 (chronic)
111TCA	20	10920 (acute) 3822 (intermediate)	--

For ATSDR MRLs, "acute" represents exposures of up to two weeks, while "intermediate" represents exposures of up to one year. CalEPA chronic RELs are based on indefinite exposure.

In summary, it is unlikely that the indoor air concentrations as reported in February 2006 pose an immediate or short-term threat. As noted in the long-term risk assessment, chronic exposures may warrant attention because of risks above the 1E-4 cancer risk goal for Superfund.

If you have any questions concerning this review, please call me at x3328.

cc: Eric Johnson (3HS41)
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